

## REMARKS

### Summary of Claim Status

Claims 1-21 are pending in the present application after entry of the present amendment. Claims 1-21 are rejected for the reasons discussed below.

Applicants request the favorable reconsideration of the claims and withdrawal of the pending rejections, in light of the following remarks.

### Rejections Under 35 USC 102(e)

Claims 1-21 are rejected as being anticipated by Agrawal et al. (published U.S. Patent Application 2004/0010767, hereinafter Agrawal). The Examiner therefore argues that Agrawal teaches every element of every claim, either expressly or by implication. (MPEP 706.02(IV) provides the following summary of the relevant standard: "For anticipation under 35 U.S.C. 102, the reference must teach every aspect of the claimed invention either explicitly or impliedly. Any feature not directly taught must be inherently present.") Applicants respectfully disagree. On the contrary, Agrawal does not even address the subject of Applicants' invention.

The claimed invention is directed to a software representation of a hardware device, i.e., a software device model. Therefore, the claims cannot be anticipated by a description of a hardware device when no evidence is presented with regard to how that hardware device is represented by a software device model.

The only references to software included in Agrawal are references to place-and-route software. Agrawal does not address the issue of how his hardware device is represented in software, and there is no reason to believe that Agrawal's software model is implemented as claimed by Applicants. The multiplicity of referenced paragraphs and figures from Agrawal do not address this issue. As noted in Applicants' paragraph [0008], "the correspondence between hardware tiles and software tiles is maintained by known software representations, regardless of the hierarchical nature of the software tile." Agrawal does not teach or suggest any other approach.

Therefore, Agrawal neither teaches nor suggests the common software tile and/or the unique software tile claimed by Applicants, much less the combination of the two types of tiles, much less their application to the hardware structure described in the preamble of the claims (nor even to the hardware structure described by Agrawal).

For at least these reasons, all independent Claims 1, 8, and 15 are allowable over Agrawal. Claims 2-7, 9-14, and 16-21 are allowable for at least the reasons of Claims 1, 8, and 15, from which they respectively depend.

Claims 2, 9, and 16 are further allowable because Agrawal neither teaches nor suggests the further limitations on the unique software tile. Agrawal does not address the question of software tiles.

Claims 6, 13, and 20 are further allowable because Agrawal neither teaches nor suggests the further limitations on the common software tile and the unique software tile, nor does Agrawal discuss PLD device models or the numbering thereof.

#### Request for Non-Final Action

If an action other than allowance of the pending claims is to be made, Applicants respectfully request that the next action be a non-final action. The outstanding Office Action is not in compliance with 37 CFR 1.104(c)(2), which states:

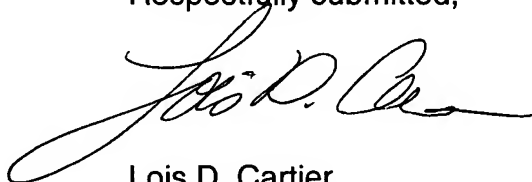
When a reference is complex or shows or describes inventions other than that claimed by the applicant, the particular part relied on must be designated as nearly as practicable. The pertinence of each reference, if not apparent, must be clearly explained and each rejected claim specified.

The pertinence of the reference should be explained because the reference does not contain any references to software tiles, device modeling, modeling software, software representations of PLDs, and so forth, which is the subject matter of the present claims.

Conclusion

All claims should be now be in condition for allowance and a Notice of Allowance is respectfully requested. If any action other than allowance is contemplated by the Examiner, the Examiner is respectfully requested to telephone Applicants' agent, Lois D. Cartier, at 720-652-3733.

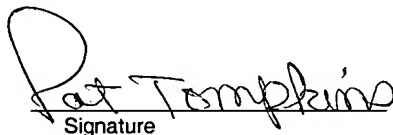
Respectfully submitted,



Lois D. Cartier  
Agent for Applicants  
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I hereby certify that this correspondence is being deposited with the United States Postal Service as **first class mail** in an envelope addressed to: Commissioner for Patents, P.O. Box 1450 Alexandria, VA 22313-1450, on January 11, 2006.

Pat Tompkins  
Name

  
Signature